	1	JAMES E. HARPER, ESQ. Nevada Bar No.: 9822	
	2	HARPER LAW GROUP	
	3	1935 Village Center Circle Las Vegas, Nevada 89134	
	4	Ph.: (702) 948-9240 Fax: (702) 778-6600	
	5	E-Mail: <u>eservice@harperlawlv.com</u>	
	6	Attorney for Defendant	
	7	UNITED STATES DISTRICT COURT  DISTRICT OF NEVADA	
	8		
	9		
	10	JILL COOK,	CASE NO.: 2:14-cv-00524-RFB-PAL
	11	Plaintiff,	
	13	vs.	STIPULATION AND ORDER TO CONTINUE HEARING ON PLAINTIFF'S
	14	STATE FARM MUTUAL AUTOMOBILE	MOTION TO COMPEL DEFENDANT STATE FARM'S RESPONSES TO
	15	INSURANCE COMPANY; and DOES I through X, inclusive,	PLAINTIFF'S FIRST SET OF
	16		INTERROGATORIES AND FIRST SET OF REQUESTS FOR PRODCUTION OF
	17	Defendants.	DOCUMENTS AND REQUEST FOR SANCTIONS
	18		(First Request)
•	19		_ (Pilot Nequest)
	17		

Defendant STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY ("State Farm") by and through its attorney, HAPRER LAW GROUP, and Plaintiff JILL COOK, by and through her attorneys, PRINCE | KEATING, hereby submit this Stipulation and Order to Continue Hearing on Plaintiff's Motion to Compel Defendant State Farm's Responses to Plaintiff's First Set of Interrogatories and First Set of Requests for Production of Documents and Request for Sanctions (Doc. # 27) pursuant to LR 6-2 and 7-1.

On January 21, 2105, this Court issued an order setting the hearing on Plaintiff's Motion for March 3, 2015 at 10:00 a.m. (Doc. # 28). On that date, counsel for State Farm will be out of the

## Case 2:14-cv-00524-RFB-PAL Document 32 Filed 02/03/15 Page 2 of 2

country on a pre-planned family vacation to Cape Town, South Africa to celebrate his grandmother's 1 100th birthday. As such, the date set for this hearing should, respectfully, be re-set for February 26, 2 2015 at 10:00 am. This is the parties' first request to reschedule the hearing, and is not made for an 3 4 improper purpose or to unnecessarily frustrate the proceedings or Court's schedule. 5 DATED this 30<sup>th</sup> day of January 2015. 6 DATED this 30th day of January 2015. 7 PRINCE | KEATING HARPER LAW GROUP 8 9 10 Nevada Bar No. 5092 Nevada Bar No. 9822 CIVIL AND COMMERCIAL LITIGATION CHRISTINA M. MAMER 1935 Village Center Circle 11 Nevada Bar No. 13181 Las Vegas, NV 89134 9130 West Russell Road, Ste. 200 13 Attorney for Defendant Las Vegas, NV 89148 14 Attorneys for Plaintiff 15 16 ORDER 17 IT IS SO ORDERED. 18 19 February 2, 2015 DATED: 20 21 22 23 24 25 26 27 28

HARPER LAW GROUP